

Rufus R. Robinson III PRO SE
Willard Imamoto PRO SE
Pastor George Piliwale PRO SE
85-124 A Ala Waiua Street
Waianae, Hawaii 96792
(808) 696-5341 Home / Business
(808) 696-3966 FAX
Email: rufus_r_robinson_iii1@msn.com

United States District Court
District of Hawaii

Rufus R. Robinson III,)	Civil No.: CV04 00672 HG KSC
Gretchen M. Robinson)	
)	MEMORANDUM IN SUPPORT OF MOTION
Plaintiffs,)	
)	
vs.)	
)	JUDGE: THE HONORABLE MAGISTRATE JUDGE
)	KEVIN S. C. CHANG
Tripler Army Medical Center; Tripler)	
Army Medical Center, Director of)	
Neonatal Intensive Care Unit; State)	
of Hawaii, Department of Human)	JURY TRIAL: May 2, 2006 at 9:00 AM
Services; State of Hawaii, Child)	
Protective Service; Patricia Snyder,)	
Social Services Division)	
Administrator; David K. Y. Kam, CPS)	
Supervisor; Elliott Plourde, CPS)	
Worker; Judge Lillian Ramirez-Uy;)	
Honolulu (City) Police Department /)	
Honolulu Police Officer K. Kanaa)	
(Badge 3617))	
Defendants)	

MEMORANDUM IN SUPPORT OF MOTION

In January, 2006, Plaintiff confusion arose over the status of this case and defendant's refusal to comply with discovery requests. The Plaintiffs fell further behind in timeliness to respond to deadlines.

Case confusion was cleared with an order by Judge David A. Ezra dated February 20, 2006 [ORDER GRANTING IN PART AND DENYING IN PART PLAINTIFFS' MOTION FOR RULING ON CASE STATUS].

TIME CONSTRAINTS

Time constraints have been a family emergency and employment workload.

PREVIOUS EXTENSIONS

Plaintiffs have not been granted an extension prior to this request.

DISCOVERY TO BE COMPLETED

Discovery requests for written depositions (30 questions)

Discovery requests for CPS, HPD, TAMC, and DHS administrative rules and customs must be requested and submitted as evidence.

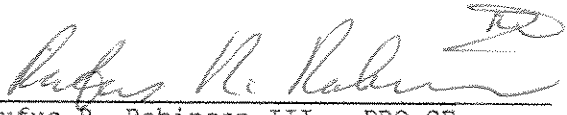
Depositions already completed must have transcription completed and submitted to the court.

Other discovery discovered during the discovery process.

CONCLUSION

Plaintiff's are Pro Se any truly require additional time to complete discovery. Additional time will allow the Plaintiffs to get back on schedule for Trial. We understand that the Rule 16 Scheduling Order may be changed to comply with this extension request.

DATED AT: HONOLULU, HAWAII THIS 14th DAY OF MARCH 2006.



Rufus R. Robinson III PRO SE
85-124 A Ala Walua Street
Waianae, Hawaii 96792 (808) 696-5341